

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT SYSTEMS,
LLC,

Plaintiff,

v.

QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC, DRJ
ENGINEERING, LLC, INSPIRED
PURSUITS, LLC, KIRK GRUNDAHL
and SUZANNE GRUNDAHL,

Defendants.

Civil Action No.
1:24-cv-00246-CEA-CHS

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff Paragon Component Systems, LLC and all Defendants Qualtim, Inc., DrJ Engineering, LLC, Center for Building Innovation, LLC, Inspired Pursuits, LLC, Kirk Grundahl, and Suzanne Grundahl, by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(c), respectfully move this Court for entry of the proposed Agreed Protective Order attached as **Exhibit A**.

As grounds, the Parties submit that certain information produced during pretrial discovery in this action may be of a confidential and private nature. The Parties have conferred and agreed upon the terms of the Agreed Protective Order in order to facilitate the discovery process. Accordingly, the Parties respectfully request that the Court enter the Agreed Protective Order attached as **Exhibit A**.

[signatures on next page]

Respectfully submitted,

s/ Erin Steelman

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